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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Hassan Nassiri,

Petitioner,

v.

Chad F. Wolf, in his official capacity as
Acting Secretary of Homeland Security,
et al.

Respondents.

Case No: 2:20-cv-00194-APG-NJK

Stipulation and Order

(Fourth Request)

Petitioner and Respondents, through undersigned counsel, stipulate and request that the Court approve a 45-day extension of time, August 20, 2020, to October 5, 2020, for Respondents to file a response to the Petition, ECF No. 1. This is the fourth request for an extension of time. *See* ECF Nos. 6, 8, 10.

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. The second and third extension of time were granted in connection with an effort to resolve this matter. *See* ECF Nos. 8, 10. Those resolution efforts and the current status are set forth below.

1 Following entry of a previous stipulation and order, ECF No. 8, Petitioner
2 submitted to Respondents' U.S. Citizen and Immigration Services (USCIS) an application
3 (N-565) for replacement of a Naturalization Certificate. USCIS has experienced delays,
4 particularly as to biometrics, due to closures of Application Support Centers. Petitioner's
5 application cleared biometrics. However, Petitioner's application also indicated a change in
6 marital status, so USCIS issued Petitioner a request for additional information and
7 documentation about that change, as well for recent photo identification. Petitioner was
8 working with his counsel to provide the requested information and documentation as of the
9 filing of the last stipulation and order for extension, ECF No. 10.

10 It took Petitioner and his counsel several weeks to obtain and provide to USCIS the
11 requested information and documents. In particular, it took a while for Petitioner to obtain
12 from the local family court a copy of a divorce decree. On August 14, 2020, Petitioner's
13 counsel mailed to the USCIS Nebraska Service Center a packet, which Petitioner believes
14 contains the requested information and records.

15 Accordingly, the parties respectfully request this extension to allow the USCIS
16 Nebraska Service Center time to review and process Petitioner's N-565 application and
17 recent submission of additional materials. Therefore, the parties respectfully request an
18 additional 45-day extension of time from August 20, 2020 to October 5, 2020, for
19 Respondents to file a response to the Petition (or a stipulation for dismissal).
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1 This stipulated request is filed in good faith and in further effort to resolve the
2 matter; it is not submitted for purposes of delay.

3 Respectfully submitted this 20th day of August 2020.

4 REZA ATHARI & ASSOCIATES

NICHOLAS A. TRUTANICH
United States Attorney

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6 /s/ Luther Snavely
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9 *Attorney for Petitioner*

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11 **IT IS SO ORDERED:**

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13 **UNITED STATES DISTRICT JUDGE**
14 **UNITED STATES MAGISTRATE JUDGE**

15 **DATED:** August 20, 2020
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